

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Preeti Kohli,

Plaintiff,

vs.

Medical University of South Carolina,
Ernest Benjamin Clyburn, MD,
individually and in his official capacity,
and Ted A. Meyer, MD, individually and
in his official capacity,

Defendants.

Case No.: 2:23-cv-02090

**PLAINTIFF'S RESPONSES TO
LOCAL CIVIL RULE 26.01
INTERROGATORIES**

Pursuant to Local Civil Rule 26.01 DSC, Plaintiff Preeti Kohli hereby answers as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER:

Plaintiff is not aware of any at this time.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

By way of her Complaint, Plaintiff has specifically requested a jury trial as to all claims asserted in this case. Plaintiff believes that all such claims are appropriate for jury resolution.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER:

Plaintiff is an individual.

(D) State the basis for asserting the claim in the division in which it was filed.

ANSWER:

This action was initially filed in the Court of Common Pleas for Charleston County. The Defendants have filed a Notice of Removal to the District Court.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Plaintiff is not aware of any at this time.

(H) Parties or Intervenors in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER:

Not Applicable.

s/ Courtney C. Atkinson
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May 24, 2023
Greenville, South Carolina